

Exhibit 13

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRIAN DONNELLY AKA KAWS and
KAWS INC.,

Plaintiff,

-against-

Case No.: 1:21-cv 9562 (PKC)

**DEFENDANTS' RESPONSES TO
PLAINTIFFS' FIRST
SET OF INTERROGATORIES**

JONATHAN ANAND, both individually and doing
business as HOMELESS PENTHOUSE,
PENTHOUSE THEORY, HIDEOUT.NYC,
INCOGNITO and YOUNG NEON, DAVID
KANG, DYLAN JOVAN LEONG YI ZHI, THE
PENTHOUSE THEORY, THE PENTHOUSE
COLLECTIVE and OSELL DINODIRECT
CHINA LIMITED,

Defendants.
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Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants, Jonathan Anand, both individually and d/b/a Homeless Penthouse, Penthouse Theory, Hideout. NYC, and Incognito (Collectively Known as "Defendants") through their attorney, Sanjay Chaubey, Esq., provides the following responses and objections to Plaintiffs' First Set of Interrogatories.

GENERAL OBJECTIONS

1. Defendants reserve the right to supplement, revise, correct or clarify any of the responses or documents provided herein.
2. Defendants provide these responses and documents without waiving or intending to Waive:
 - (a) Any questions as to competency, relevancy, authenticity, materiality, privilege, right to a protective order for trade secrets or other reasons or admissibility in evidence of the

responses and of any documents produced or of their respective subjects' matter in the trial of this action;

(b) The right to object to the use of any of the document produced, the responses herein, or their subjects' matter at the trial of this action; and

(c) The right to object on any ground to any further requests for discovery or the right to claim a privilege with respect thereto.

3. Defendants object to Plaintiff's First Set of Interrogatories to the extent that they purport to impose discovery requirements and/or obligations that are inconsistent with or exceed the obligations imposed under Article 31 of the New York Civil Practice Law and Rules.
4. Defendants object to each Interrogatory to the extent that it calls for information protected by the attorney-client privilege, work product and/or any confidential and proprietary privileged information held by Defendants, or any other applicable privilege.
5. Defendants object to each Interrogatory to the extent that it is unnecessarily burdensome, oppressive, vague and ambiguous, unreasonable cumulative or duplicative.
6. Defendants object to each Interrogatory to the extent that it calls for a legal conclusion.
7. Defendants object to each Interrogatory to the extent that Plaintiff seeks information that is neither relevant to the subject matter involved in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence.
8. Defendants object to each Interrogatory to the extent that plaintiff failed to phrase its interrogatories with clarity and fairness.
9. Defendants object to each interrogatory to the extent that it calls Defendants to admit facts and conclusions of law, which have yet to be determined, by the Court or Jury.
10. Defendants incorporate by reference all of the above general objections into its specific objections below.

11. Defendants reserve the right to seek an appropriate protective order with regard to any of the objectives or privileges contained herein.

Responses to Interrogatories

1. Defendant states that there are over 100 sellers on websites such as eBay, AliBaba, AliExpress, and DHGate. Defendant further states,
 - a) visit www.ebay.com and enter KAWS on search bar and about 240 vendors pop-up selling KAWS products, and with approximately 9 more pages to open, there are about 2160 vendors selling KAWS products on eBay;
 - b) to visit www.amazon.com and enter KAWS on search bar and about 60 vendors pop-up selling KAWS products, and there are approximately 48 more pages to open, with about 2880 vendors selling KAWS products on Amazon;
 - c) visit www.alibaba.com and enter KAWS on search bar and about 56 vendors pop-up selling KAWS products on first page, and there are approximately 50 or more pages to open, with about 2800 vendors selling KAWS products;
 - d) additionally, the same search bar tool and approximate number of vendors applies to www.aliexpress.com and www.dhgate.com.
2. Refer to above answer No. 1 - 1 d.
3. Defendant states his response to Interrogatory 3 as Not Applicable.
4. Defendant states his response to Interrogatory 4 as Not Applicable.
5. Defendant states his response to Interrogatory 5 as Not Applicable.
6. Defendant states his response to Interrogatory 6 as Not Applicable.
7. Defendant states his response to Interrogatory 7 as Not Applicable.
8. Defendant states his response to Interrogatory 8 as Not Applicable.

9. Defendant states his response to Interrogatory 9 as Not Applicable.
10. Defendant states his response to Interrogatory 10 as Not Applicable.
11. Defendant states his response to Interrogatory 11 as Not Applicable.
12. Defendant states his response to Interrogatory 12 as Not Applicable.
13. Defendant states his response to Interrogatory 13 as Not Applicable.
14. Defendant states his response to Interrogatory 14 as Not Applicable.
15. Defendant states his response to Interrogatory 15 as Not Applicable.
16. Defendant states his response to Interrogatory 16 as Not Applicable.
17. Defendant states his response to Interrogatory 17 as Not Applicable.
18. Defendant states his response to Interrogatory 18 as Not Applicable.
19. Defendant states his response to Interrogatory 19 as Not Applicable.
20. Defendant states his response to Interrogatory 20 as Not Applicable.
21. Defendant states his response to Interrogatory 21 as Not Applicable.
22. Defendant states,
 - i. jonathananad@gmail.com
 - ii. jonathananad@gmail.com
 - iii. 4211 Radius Way, Newport News, VA 23602; 55 Meadow St., Brooklyn, NY 11206;
90 Eldridge St. New York, NY 10002; 2551 McMenamin St. Hampton. VA 23666.
 - iv. Flat 4D, 14-18, Stauton Street, Soho, Central, Hong Kong.
 - v. None
 - vi. None
 - vii. Online
 - viii. Online
23. Defendant states his response to Interrogatory 23 as None.

Dated: April 10, 2022.
New York, NY

/s/ Sanjay Chaubey

SANJAY CHAUBEY, Esq.
Attorney for Defendants
Jonathan Anand, individually and doing business as
Homeless Penthouse, Penthouse Theory, Hideout
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To:

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